

# EXHIBIT K

1 UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

2 MDL Docket No. 1629

Master File No. 04-1000

3 In re: NEURONTIN MARKETING,

4 SALES PRACTICES AND PRODUCTSLIABILITY LITIGATION

5 \_\_\_\_\_xTHIS DOCUMENT RELATES TO:

6 Bulger v. Pfizer, et al.

7 07-CV-11426-PBS\_\_\_\_\_x

10 VIDEO DEPOSITION OF JANET ARROWSMITH-LOWE, M.D.

JANET ARROWSMITH-LOWE

11 9:18 a.m.

Homewood Suites by Hilton

12 7101 Arvada Avenue, N.E.

Albuquerque, New Mexico

15 PURSUANT TO THE FEDERAL RULES OF CIVILPROCEDURE, this deposition

16 TAKEN BY: MR. KEITH L. ALTMAN

17 Attorney for the Products Liability

Plaintiffs

22 REPORTED BY: Jan A. Williams, RPR, CCR 14

Bean & Associates

23 Professional Court Reporting Service

201 Third

24 Albuquerque, New Mexico 87102

25 (1945D) JAW

1           A.    Well, I guess there are kind of a lot of  
2   levels of that.  Whether you're talking about  
3   completed suicide or someone who attempts suicide but  
4   does not complete the act or has not acted in a way as  
5   to terminate their life, I mean they're still  
6   suicidal.

7           Q.    Objection, nonresponsive.

8                   Does everybody who exhibits suicidal behavior  
9   actually commit suicide?

10          A.    If they exhibit suicidal behavior, it would  
11   imply that they are placing themselves at risk for  
12   suicide.

13          Q.    Objection, nonresponsive.

14                   Does everybody who exhibits suicidal behavior  
15   commit suicide?

16                   MR. BARNES:  Objection, asked and answered.  
17   She's answered it three times.

18   BY MR. ALTMAN:

19          Q.    She has not answered it.

20          A.    What do you mean by suicide?

21          Q.    Commits -- do you know what the term to  
22   commit suicide means?

23          A.    Do you -- what do you mean by suicide?  Do  
24   you mean that someone has actually killed themselves?

25          Q.    That's what to commit suicide means.

1 A. No, it doesn't.

2 Q. That's fine.

3 A. I don't think so. I think you were asking me  
4 if they -- if suicide -- about suicidal behavior.  
5 That's not the same as actually a completed suicide.

6 Q. Okay. That's what I'm saying. So  
7 everybody -- so not everybody who -- who exhibits  
8 suicidal behavior actually completes suicide, correct?

9 A. Yes, I believe I've -- I've said that several  
10 times, yes.

11 Q. And not everybody who exhibits suicidal  
12 behavior attempts suicide, correct?

13 MR. BARNES: Objection, asked and answered.  
14 You may answer.

15 THE WITNESS: I don't know what you mean by  
16 attempts suicide.

17 BY MR. ALTMAN:

18 Q. What do you think attempts suicide means?

19 A. I'm not asking the question.

20 Q. I'm asking -- I'm asking what does attempt  
21 suicide mean in your mind?

22 A. It means someone has made preparatory acts to  
23 commit suicide, it means that they have in some way  
24 perhaps attempted to complete a suicide. I  
25 mean they -- I don't think there's a clear definition